



October 2, 2009

The Honorable Peter DeVries, Council Chair
Washington State Building Code Council
128 10th Avenue SW
P.O. Box 42525
Olympia, WA 98504-2525

Dear Chairman DeVries:

This is supplemental testimony which addresses issues raised at the September 29th hearing. As I mentioned in my oral testimony in Renton, the Northwest Energy Efficiency Alliance (NEEA) is funded by the electric utilities across the region, including all Washington utilities. Washington utilities have long supported energy efficiency and understand that energy codes are a very low-cost approach to gaining savings that will reduce the need for constructing future power plants.

In Renton, two lighting designers testified that the proposed changes to the lighting sections of the code were overly aggressive and should be replaced with more modest increases. The results of an \$800,000, statistically representative research effort conducted by NEEA shows that, in many cases, the proposed changes represent no change at all from what was being installed years ago in many buildings. NEEA's study¹ looked at Northwest commercial buildings constructed between 2002 and 2004 – six to eight years before the proposed code changes will go into effect. Analysis shows that:

- 46% of the buildings surveyed would have passed the proposed 2010 code with no changes at all.
- 70% of the buildings surveyed would have passed the proposed 2010 code with only the following simple technology replacements – no changes to the lighting design would be required.
 - Standard T8 lamps and ballasts replaced with T8 high performance lamps and ballasts or T5 technology. (Note that standard T8 lamps will be banned by federal law in 2011);
 - High Intensity Discharge fixtures replaced with T8 fixtures or equivalent;
 - Incandescents: 50% replaced with compact fluorescents or equivalent.

On a separate topic, I have included a CD which contains an electronic copy of the Northwest Power and Conservation Council's (NW Council) draft 6th Power Plan. This document will provide additional context on the policy issues relating to energy conservation as well as detailed analysis of the impacts buildings place on the electric system and least-cost approaches to meeting the electric energy demands of the region. In particular the State Building Code Council will be interested in the description of the Model Conservation Standards, the NW Council's recommendations for building energy codes.

¹ Available at <http://www.nwalliance.org/research/reports/08-196.pdf>

To support detailed economic analysis by the State Building Code Council, I have also included on the CD the detailed cost-benefit analysis developed by the NW Council. This is one of the best-detailed sources of efficiency measure cost data and life cycle cost analysis in the nation. For residential measures use the file 'nwcouncil-res measures.zip'. For commercial building measures reference the file 'nwcouncil-com measures.zip'.

Sincerely,

A handwritten signature in cursive script that reads "David Cohan". The signature is fluid and written in dark ink.

David Cohan
Manager, Codes and Standards